

RICHARD J. CODEY

Acting Governor

DEPARTMENT OF THE TREASURY
DIVISION OF PURCHASE AND PROPERTY
P. O. BOX 230
TRENTON, NEW JERSEY 08625-0230

JOHN E. MCCORMAC, CPA State Treasurer

March 15, 2005

Addendum #1

Re: Business Continuity Plan for Emergencies – Casino Control Commission, 05-X-37296

Bid Proposal Due Date: April 12, 2005 at 2:00 P.M.

Dear Potential Bidders:

This letter and its attachments form Addendum #1 to the Business Continuity Plan for Emergencies, 05-X-37296. The addendum, which represents Appendix #3 on page 8 of the posted RFP and was originally omitted, is composed of two (2) parts:

Part I - Original Casino Control Commission Business Continuity Plan - Summary Part II Original Casino Control Commission Business Continuity Plan

The Bid Proposal due date remains scheduled for April 12, 2005 at 2:00 P.M.

Bidders should keep an eye on the web site in case additional addenda are issued between now and bid opening.

It is important for bidders to review and cross-reference this addendum to the RFP prior to preparing a bid.

mailto:roy.hambrecht@treas.state.nj.us

Part I

NEW JERSEY CASINO CONTROL COMMISSION BUSINESS CONTINUITY PLAN SUMMARY

A. Overview

The Casino Control Commission is in but not of the Department of the Treasury. Along with its sister agency, the Division of Gaming Enforcement (DGE), which is part of the Department of Law and Public Safety, the Commission regulates the casino industry in Atlantic City, New Jersey. The Commission maintains its primary office in the Arcade Building at Tennessee and Boardwalk, in Atlantic City. The five-member panel is supported by a staff of approximately 355 employees, roughly half of whom work out of or in the Arcade Building, a leased facility that also houses four retail establishments and approximately 20 employees of the DGE. The remainder of the staff, namely the Inspection Unit, works "in the field" at the various casino hotels, which, by statutory mandate, must be monitored at all times of operation, *i.e.*, 24/7.

The Inspection Unit works out of Casino Control Commission booths and Principal Inspectors' offices, of which there is one in each casino. The Commission also maintains a small (approx. 600 sq. ft.) satellite office in Trenton, located in the State Office Building at 135 West Hanover Street.

In the event of a disaster that requires the Commission to vacate the Arcade Building, the Commission's first refuge would be the Showboat Hotel and Casino. The Principal's office at that facility is large enough for the Commission to direct its essential functions for a period of up to five days. The Business Continuation plan calls for the Commission members and the eightmember Directors' Advisory Team, along with other essential personnel, to assemble there. In the event the Showboat is also unavailable, the Commission could function out of any of the other casinos, each of which have sufficient meeting space and computer capability tied to the virtually all of the Commission's critical systems to permit the agency to maintain operations in an emergency. If the scope of the disaster is such that Atlantic City is effectively uninhabitable, the need for Commission operations would largely cease, but those functions that had to be maintained could be maintained out of the Trenton office.

B. **Emergency Contact Information (**all area code 609 unless otherwise indicated.)

Chair:	Linda M. Kassekert	441-3557 (W)	442-7722 (C)
Vice Chair:	William Sommeling	441-3205	732-580-4418
Commissioner:	Michael Fedorko	441-3772	462-3307
Commissioner:	Michael Epps	441-3568	412-1208
Commissioner:	Ralph G. Frulio	441-3014	908-489-4068
Exec. Secty/Genral Counsel:	Diana Fauntleroy	441-3815	412-1383
Director of Administration:	Linda Brooks	441-3385	457-6004
Showboat, Principal's Office:		441-3778	
Trenton Office:		777-4266	

1. Critical Functions

- ❖ OIT Connectivity. Virtually all systems at the Commission are dependent upon the computer hook-ups to the Network, Internet, to other state agencies, and among Commission employees. If any facet of that connectivity is severed, the Commission's operations will be severely hampered. How we deal with most of the problems that can reasonably be anticipated will be discussed in the ensuing section.
- ❖ Revenue Certification. Revenue certification is accomplished in essentially two steps: the inspectors verify the count of the monies "won" by the casinos, and the auditors audit the extensive paper trail that accompanies the money.
- ❖ Issuance of License Credentials. Staff members maintain the files of licensees and applicants, and effectuate the Commission's decisions regarding the licensing and qualification of all persons doing business at or with the casinos.
- ❖ Internal Control Submissions. While casinos have a number of internal control requirements imposed upon them, the most significant from a gaming perspective are the internal controls that relate to the play of the various games, to the movement of money, and to credit transactions. These internal controls are scrutinized and monitored for regulatory compliance by various members of the staff.
- Hearings and Public Meetings. At its bi-weekly public meetings, the Commission decides contested cases regarding licensees and registrants, determines petitions filed by casino licenses and other interested parties, and considers regulatory matters presented by its staff, the DGE or member of the public. The Commission also conducts the hearings, sometimes collectively, sometimes with individual Commissioners assigned as hearing officers, on contested cases. These and other specialized hearings are scheduled as needed.
- ❖ Budget Functions. The Commission's Budget and Fiscal Unit handles the purchase and distribution of supplies, equipment and other materials as necessary for the functioning of the agency.
- Human Resources Functions. The Commission's Human Resources Unit processes all new hire, promotion, termination, employee benefit and discipline matters, and handles most other personnel-related assignments for the Commission.

2. Essential Employees

A. Commissioners' Office

Linda M. Kassekert
 William Sommeling
 Michael Fedorko
 Michael C. Epps
 Ralph G. Frulio
 Chair
 Vice-Chair
 Commissioner
 Commissioner
 Commissioner

B. <u>Directors' Advisory Team</u>

- . Diana Fauntleroy General Counsel/Executive Secretary
- . Christopher Storcella, Director Division of Licensing
- . Richard Franz, Director Division of Compliance
- . Noreen Iannuzzi, Director Division of Financial Evaluation
- . Linda Brooks, Director Division of Administration
- . Marvin Askins, Affirmative Action Officer EEO/AA Office
- Daniel Heneghan, Director Public Information Officer
- . Rosemary Graziano Chief of Staff

C. <u>IT Specialists</u>

- . Gloria Broeker Chief Information Officer
- . Babu Verghese AS 400 Manager
- . Karen Koptic Systems Service Manager

D. Staff Members (Middle Management)

- . Leonard DiGicaomo Assistant General Counsel
- . David Missimer Assistant General Counsel
- . Mary Wozniak Assistant General Counsel
- . E. Dennis Kell Assistant General Counsel
- . Barbara Mattie Manager, Casino Operations
- . Rochelle Jefferson Manager, Field Gaming Operations
- . Jody Feldman-Karsevar Manager, Budget & Fiscal
- . Christopher Glaum Manager, Financial Evaluation Unit
- . Marybeth Butler Manager, Audit Unit
- . Kevin Garvey Manager, Revenue Unit
- . John I. Bowman Manager, Employee License Unit
- . Steven Ingis Assistant General Counsel, Legal Advisory Unit
- . Sharon Hand Manager, Enterprise License Unit
- . John Kovac Manager, Administrative Operations
- . Dolores Hamilton Manager, Human Resources

E. <u>License Division Cage Personnel</u>

- . Willie M. Palin Customer Service Rep.
- . Iris C. Butts Customer Service Rep.
- . Indra J. Qareeb Customer Service Rep.

F. Administrative Operations Personnel

- . Leonora Humphreys Secretarial Assistant II
- . Barbara Gallo Administrative Analyst
- . Daryl Nance Administrative Analyst

In the event the New Jersey Casino Control Commission's Arcade Building operations were interrupted by a catastrophe, in order to maintain critical functions for periods of time ranging from one to five days, the Commissioners, the Directors' Advisory Team and additional critical staff employees would be relocated to the Commission's Principal Inspector's Office located in the Atlantic City Showboat Casino Hotel, 801 Boardwalk, Atlantic City, NJ 08404.

A. Contact Point

CCC Principal Inspector's Office, Showboat Casino/Hotel Telephone No. (609) 441-3778; Facsimile No. (609) 441-3647

B. <u>Commissioners, Directors' Advisory and Critical Staff Members</u>

1. Commissioners

Linda M. Kassekert
 William T. Sommeling
 Michael A. Fedorko
 Michael Epps
 Ralph G. Frulio
 Chair
 Vice-Chair
 Commissioner
 Commissioner
 Commissioner

2. <u>Directors' Advisory Team</u>

- . Dianna Fauntleroy, General Counsel/Executive Secretary
- . Christopher Storcella, Director Division of Licensing
- . Richard Franz, Director Division of Compliance
- . Noreen Iannuzzi, Director Division of Financial Evaluation
- . Linda Brooks, Director Division of Administration
- . Marvin Askins, Affirmative Action Officer EEO/AA Office
- . Daniel Heneghan, Director Public Information Officer
- . Rosemary Graziano Chief of Staff

3. IT Specialists

- . Gloria Broeker Chief Information Officer
- . Babu Verghese AS 400 Manager
- . Karen Koptic System Service Manager

4. Staff Members (Middle Management)

- . Leonard DiGiacomo Assistant General Counsel
- . David Missimer Assistant General Counsel
- . Mary Wozniak Assistant General Counsel
- . E. Dennis Kell Assistant, General Counsel
- . Barbara Mattie Manager, Casino Operations
- . Rochelle Jefferson Manager, Field Gaming Operations
- . Jody Feldman Karsevar Manager, Budget & Fiscal
- . Christopher Glaum Manager, Financial Evaluation Unit
- . Marybeth Butler Manager, Audit Unit
- . Kevin Garvey Manager, Revenue Unit
- . John I. Bowman Manager, Employee License Unit
- . Steven Ingis Assistant General Counsel, Legal Advisory Unit
- . Sharon Hand Manager, Enterprise License Unit
- . John Kovac Manager, Administrative Operations
- . Dolores Hamilton Manager, Human Resources

5. License Division Cage Personnel

. Willie M. Palin – Customer Service Rep.

- . Iris C. Butts Customer Service Rep.
- . Indra J. Qareeb Customer Service Rep.

6. <u>Administrative Operations Personnel</u>

- . Leonora Humphreys Secretarial Assistant II
- . Barbara Gallo Administrative Analyst
- . Daryl Nance Administrative Analyst

Any suspension of Arcade Building operations that extends beyond five days would require the Commission to obtain office space of approximately 52,000 square feet. Fortunately for this purpose, there is no shortage of space available in the Atlantic City area. The Commission has an understanding with officials at the Atlantic City Convention Center that sufficient space will be made available in the event of an emergency that does not compromise all of Absecon Island. In the event all of Absecon Island is compromised vacant department stores located offshore would be utilized.

Part II

NEW JERSEY CASINO CONTROL COMMISSION BUSINESS CONTINUITY PLAN

INTRODUCTION

The Casino Control Commission was created in 1977 for the express purpose of regulating casino gaming in New Jersey. By statutory design, the Commission is an independent agency that is "in but not of" the Department of the Treasury. It is a five-member board appointed by the Governor with the advice and consent of the Senate. The Commission is headed by the Chair who serves as its chief executive officer. The Commission staff is dispersed among four divisions, Financial, Licensing, Compliance and Administrative, and the Office of the Commissioners, which, in addition to the Commissioners' personal staff, includes the Office of the Chief of Staff, the Office of the General Counsel and the Public Information Officer. The agency's policies are promulgated by its Directors' Advisory Team, subject to the approval and adoption by the full Commission. The Directors' Advisory Team is comprised of the Chief of Staff, the General Counsel, the four Division Directors, the Public Information Officer and the Affirmative Action Officer.

Among its current authorized complement of 355 staff members are attorneys, accountants, IT specialists and a variety of other professionals who specialize in licensing, regulatory compliance, and other disciplines integral to the efficient and effective regulation of the casino industry. Approximately half of the Commission's employees are assigned to the inspection unit, which maintains on-site oversight of operations in each of the 12 Atlantic City casinos around the clock, seven days a week.

The inspectors are assigned to work rotating shifts at the various casino hotels, which are privately owned by the casino licensees. Each facility has a Commission booth located just off the casino floor, where Inspectors and Supervising Inspectors work in teams of anywhere from two to five, depending on the size of the casino and the time of the shift. Each casino also has an office in the "back of the house" area for the Principal Inspector, one of whom is assigned to each casino. Parking for inspection personnel assigned to each casino is in the various parking garages attached to or near the casino hotel.

The remainder of the staff, together with the five Commissioners, work out of the Arcade building, a leased facility located at Tennessee and the Boardwalk in Atlantic City. Commission occupies approximately 80% of the building, which is owned by Regency Development of Marco Island, Inc., a holding company of Levitt Properties, which is located at 100 Quarry Road, Suite 2, Hamburg, N.J. 07416. Other tenants who occupy the building include small elements of the Commission's sister agency, the Division of Gaming Enforcement, of the Department of Law and Public Safety (hereafter, DGE), the Boxing Commission, of the State Athletic Control Board, and four retail establishments which have stores fronting on the Boardwalk. The Arcade building is a two-story edifice, with parking facilities in the basement for about 50 Commission employee vehicles, plus limited parking for Division of Gaming Enforcement, Boxing Commission, and store tenants. Parking for the remaining office staff is in an adjoining surface lot. In addition to office space, the Arcade building includes two areas of public accommodation: the Commission's public meeting room, where its bi-weekly meetings and most of its license hearings are conducted, and the cage area of the Licensing Division, where applicants for employee licenses, among others, come to process their applications. Participants in contested cases also come to the Arcade building on diverse days for hearings and prehearing conferences.

The Commission also maintains a small satellite office in the State Office Building in Trenton of approximately 600 sq. feet. The office contains four PC's connected to all of the Commission's critical systems. It also contains an AS400 computer, which serves as a backup to the agency's main AS400 that is housed in the Arcade building. It should be noted that one Commissioner, plus a small number of staff members reside in Mercer County.

The Commission's primary functions are to certify the gross revenue generated by the casinos, collect the 8% tax for the benefit of programs for the disabled and senior citizens of the State, and maintain public confidence in the integrity of the games and of the regulatory process. Each casino, its parent and other affiliated companies are subject to strict licensing criteria. Based on investigative reports filed by the DGE, the Commission determines the fitness of casino license applicants. Similarly, the Commission determines the qualifications of each individual who seeks an employee license to work in a casino or a casino service industry license for persons and entities endeavoring to conduct business, whether gaming related or non-gaming related, with casinos. In addition to these licensees, the Commission issues credentials that are subject to lesser standards of qualification to other persons and entities associated with the casino industry, such as labor unions and hotel workers.

This Business Continuity Plan has been prepared at the direction of the State Government Preparedness Group.

1. CRITICAL FUNCTION IDENTIFICATION.

It is arguable that a body that regulates casino gaming has no truly *critical* functions in the common sense of that term. Certainly casino regulation has little to do with matters bearing on the health, safety or welfare of the citizens of New Jersey, except in one particular. The money that the Commission is responsible for, the 8% tax on casino revenues, is deposited into a special account known as the Casino Revenue Fund. By statute (*N.J.S.A.* 5:12-145c), that money is appropriated exclusively for "reductions in property taxes, rentals, telephone, gas, electric, and municipal utilities charges of eligible senior citizens and disabled residents of the State, and for additional or expanded health services or benefits or transportation services or benefits to eligible senior citizens and disabled residents, as shall be provided by law...." In practice, the money from the Revenue Fund – in excess of \$340 million per year – goes to such programs as Lifeline Credit (\$200 towards utility bills of qualifying seniors and disabled) and Pharmaceutical Assistance to the Aged and Disabled (\$5 for prescriptions of qualifying seniors and disabled).

In the context of those matters and the continued employment of the 48,000 citizens employed in the casinos, as well as the multitude of rehabilitation projects that have been and will be accomplished through the fruits of legalized casino gaming, the following are the critical functions of the Casino Control Commission:

- LAN and OIT Connectivity. Virtually all systems at the Commission are dependent upon the computer hook-ups to the Internet, to other state agencies, and among Commission employees. If any part of that connectivity is severed the Commission's operations will be hampered. How we would deal with most of the problems that can reasonably be anticipated will be discussed in the ensuing section.
- Revenue Certification. Revenue certification is accomplished in essentially two steps: the inspectors verify the count of the monies "won" by the casinos, and the auditors audit the extensive paper trail that accompanies the gaming and credit transactions.
- Issuance of License Credentials. Staff members maintain the files of licensees and applicants, and effectuate the Commission's decisions regarding the licensing and qualification of all persons doing business at or with the casinos
- Internal Control Submissions. While casinos have a number of internal control requirements imposed upon them, the most significant from a gaming perspective are the internal controls that relate to the play of the various games, to the movement of money, and to credit transactions. These internal controls

- are scrutinized and monitored for regulatory compliance by various members of the staff.
- Hearings and Public Meetings. At its bi-weekly public meetings, the Commission decides contested cases regarding licensees and registrants, determines petitions filed by casino licenses and other interested parties, and considers regulatory matters presented by its staff, the DGE or members of the public. The Commission also conducts the hearings, sometimes collectively, sometimes with individual Commissioners assigned as hearing officers, on contested cases. These and other specialized hearings are scheduled as needed.
- Budget Functions. The Commission's Budget and Fiscal Unit handles the purchase and distribution of supplies, equipment and other materials as necessary for the functioning of the agency.
- Human Resources Functions. The Commission's Human Resources Unit processes all new hire, promotion, termination, employee benefit and discipline matters, and handles most other personnel-related assignments for the Commission.

2. CRITICAL FUNCTION CONTINUATION (FACILITY/EQUIPMENT INTERRUPTION).

In order to maintain these critical functions in various circumstances and for three different periods of time, *viz.*, one, five and 30-day periods of interruption, the Commission would take the measures discussed below. However, it should be noted that the oversight operations at the various casinos will generally not be performed at any particular facility that is compromised to the extent that its gaming operations are suspended. As a general proposition, the Commission would take whatever action was necessary and reasonable to secure any revenue that had not yet been counted, and vacate the facility for as long as casino operations are suspended. Inspectors assigned to such a facility would be re-assigned to other facilities for the duration.

A. Physical Space.

- 1, 2 and 3. In the event the Arcade building operations were interrupted by a catastrophe to the Arcade building, physical space requirements would not present a serious obstacle.
- a) A one-day suspension of operations would not warrant relocation of the bulk of the staff to any particular location. The Directors' Advisory Team and the Commissioners would, however, convene at one of the larger casinos, preferably the Showboat, which has the largest Principal Inspector's office. All of the Commission booths and principal inspectors' offices have computers tied to virtually all of the Commission's critical systems through the Arcade Building. The Commissioners and the Directors' Advisory Team, along with such members of the staff as may be needed, could run critical operations from that or any other casino, each of which has abundant space to accommodate the agency's needs.
 - In the event of a catastrophe that eliminates from consideration any Atlantic City site, the Commission and Directors' Advisory Team would repair, at least initially, to the Trenton office.
- (b) A five-day suspension of operations would require approximately 5,000 square feet of office space, since the Commission would include approximately 35 critical staff employees from its middle management group to pursue critical operations. The Principal's office at Showboat is sufficiently large to fill most of this need. If necessary, some of the critical staff could work out of other space in Showboat, other Atlantic City hotels, or other sites discussed in paragraph (c) below. Particular members of the Directors' Advisory Team and Commissioners could, if necessary, meet in the Trenton office.

- (c) Any suspension of Arcade building operations that extended beyond five-days would require the Commission to obtain office space of approximately 52,000 square feet. Fortunately for this purpose, there is no shortage of space available in the Atlantic City area. The Commission has an understanding with officials at the Atlantic City Convention Center that sufficient space will be made available in the event of an emergency that does not compromise all of Absecon Island. Several area realtors have also expressed a willingness to rent adequate space offisland at below market rates, one as little as \$5.00 per square feet in the Cardiff Circle area, which is particularly desirable due to its ready access to major highways.
- 4. Operations can continue off-site indefinitely, assuming computer systems are operable.
- 5. Employees will be notified of new locations by means of a calling tree. The agency is also looking into the possibility of automated telephone notifications.
- 6. Required furnishings and equipment include PC's, printers, desks, chairs, telephones, copy and fax machines, typewriters, paper, pens and other miscellaneous office supplies. In addition, the Commission would require a meeting room with a public address system adequate for public meetings and hearings.
- 7. Notice to the public would be accomplished through newspaper, radio and television announcements, as well as direct mail to interested parties already on the Commission's mailing list for meeting and hearing notices.

B. Staffing.

- 1. Listings of all Commission staff, with home phone numbers and, where available, mobile phone numbers and personal email addresses have been shared with each Commissioner and members of the Directors' Advisory Team. In addition, a complete listing is maintained in the Trenton office.
- 2. Critical personnel include:
 - (a) for a one-day interruption, the Commissioners and Directors' Advisory Team members, plus two IT specialists;
 - (b) for a two- to five-day interruption, approximately 35 staff members, mostly middle managers, Licensing Division cage and Administrative Operations personnel would be added to the list in 2(a).
 - (c) for a period of five to thirty days, the Commission would expect to operate with its full complement of Arcade staff.
- 3. The Commission is compiling information on the special skills, training and credentials of its staff.
- 4. If multiple locations are used:
 - (a) One-day interruption would require no division of employees.
 - (b) For a one- to five-day interruption, employees could be assigned to various casinos, the Trenton office and the offices of the DGE located at 1300 Atlantic Avenue in Atlantic City.

C. Mail.

1. A delay or stoppage of the mail for a period of one or one to five days would have negligible effect on Commission operations. Beyond that, however, the effect of an extended interruption of the mail would be significant. Much of the Commission's business is conducted through the mails. Many licensing matters are mail-driven, as are the notifications to the Secretary of State, the industry and other interested individuals.

- 2. Special needs of the Commission include direct mail of materials submitted by counsel appearing before the agency in contested cases and other matters, which are often time-sensitive. Other regulatory operations are similarly dependent upon prompt, efficient delivery of mail.
- 3. The Commission maintains a list of persons who volunteered their personal email addresses. Included are virtually all those identified as critical personnel.
- 4. The Commission would utilize commercial mail and delivery services, such as Federal Express, UPS and Airborne, and messenger services in the event the US mail was not available.

D. IT Issues.

Like most agencies, and perhaps more than some, the Commission is largely dependent upon its various computer-based systems. Inter-office communications, for example, are primarily accomplished by means of intra-net electronic mail, which resides on an AS400 server maintained in the Arcade Building and backed up in Trenton? Inter-agency mail and other communications with persons outside the agency are primarily accomplished through OIT's Internet mail. Similarly, PMIS, TALRS, NCFS, MACSE, Enterprise Licensing System, and other such communications utilize OIT-controlled systems. Thus, of necessity the Commission will rely on OIT to resolve any connectivity issues or problems in the event of a catastrophe.

- 1. Required hardware and software needs of the Commission include:
 - PC's or laptops, servers, network hubs and printers.
 - Microsoft Office Suite, Lotus Notes and emulation packages.
- 2. Trenton office houses the backup AS/400 and four PC's connected to OIT. In addition, Vital Records, Inc., located at 563 New Center Road, Flagtown, NJ, maintains backup tapes for both AS/400 and LAN-based data.
- 3. If the IT equipment were unavailable, the Commission would resort to pen and paper records, typewriters and couriers.
- 4. Critical applications other than email include: all AS/400 applications (casino, employee and some casino service industry license data, gross revenue records, time and expense records, and the like), TALRS, PMIS, MACSE and NCFS, contested case information, internal control submissions, slot data and petition status.
- 5. Laptop computers are assigned to each of the auditors who conduct field audits of the casinos. In addition, a repository of several more is maintained for use as operational requirements may dictate. In the event of an emergency, all laptops will be removed from the Arcade building for use wherever the Commission sets up its business continuation offices.

E. Document Handling.

- 1. The critical functions of the Commission are outlined in the answer to question No. 1 at pages 5 and 6 above. The forms that relate to those functions include: financial reporting manual and its related report forms; license application and qualification forms; various restriction and exclusion lists; purchase and distribution forms; time and expense forms; and various personnel forms such as leave requests, performance evaluations, injury and disability reports, and benefits.
- 2. Paper, or where possible, disk copies of all required documents and forms are maintained in the Trenton office.
- 3. See E2 above.
- 4. See E2 above.

F. Special Intervention.

The Commission does not anticipate any need to resort to means other than those set forth above. It also recognizes that unforeseeable events will require extraordinary measures. The Commission is confident that it will be able to devise appropriate measures to meet any contingency.

3. CRITICAL FUNCTION CONTINUATION.

Should large numbers of Commission staff be unavailable to continue Commission operations, the following measures will be put into place:

A. Chain of Command/Order of Succession.

As previously noted, the Commission is headed by the Chairman. If the Chairman were unable to act, the Vice Chair, who is elected by the Commission at the Commissions annual organizational meeting, would serve in the Chairman's stead. In the unlikely event both the Chair and Vice Chair were unavailable, the duties of the Chairman would fall to the next senior Commissioner.

As for the Directors' Advisory Team, the Commission has no deputy director or assistant director positions, nor is there any first assistant general counsel or full time assistant affirmative action officer. Nevertheless, each division and office is staffed with sufficiently knowledgeable and experienced staff to allow for substitution for any Directors' Advisory Team member or other critical position (IT specialists, to name but one example) to allow for successful succession.

B. Minimum Staffing.

- 1. See 2B2 above.
- 2. Many staff members have held other positions within the agency. Several former inspectors, for example, now hold positions in the audit operations units, among others. In the unlikely event of a need to replace inspectors, reassignment of these persons can fill any reasonably expected gaps. While certain professional positions, such as attorneys and accountants, could conceivably pose more difficulties if substantial portions of the staff were disabled from functioning, the DGE has its own similar staff which, if a true crisis occurred, could fill the breach.
- 3. With regard to the cross training of personnel, there has been no concerted effort to address that concern. However, in question No. 1 at pages 5 and 6, the Commission's critical functions are listed in priority order. For staffing purposes, those functions can be grouped as follows:
 - a. OIT
 - b. Revenue Certification and Issuance of License Credentials
 - c. Internal Control Submissions
 - d. Hearings and Public Meetings
 - e. Budget and Human Resources Functions

C. Delegation of Authority/Function.

1. Attorneys are assigned to the General Counsel's Office, the Licensing Division and the Compliance Division, but all are under the general supervision of the General Counsel. In an emergency, attorneys from any division can handle the work of attorneys in other divisions. Similarly, accountants or persons with an accounting background are assigned to the Financial Division and to two units within the Compliance Division, the inspection unit and the operations unit. Within the Licensing Division, personnel assigned to the employee licensing unit can fill in for those normally assigned to the casino service industry unit, and vice versa. In addition, because there have been numerous cross-divisional promotions and transfers, there are current employees who could fill virtually any position that needed to be filled with minimal, if any, training.

2. As previously noted, if the crisis were truly grave, the DGE could supply personnel to fill in for Commission employees in certain positions, including attorneys, accountants, IT specialists, licensing specialists, even human resources professionals. Other State agencies, such as the Treasury, Department of Personnel and Law and Public Safety could also be called upon to supply employees who could help out in matters within their respective disciplines.

D. Emergency Training.

- 1. The Inspection unit has a cadre of personnel who regularly train newly-hired inspectors in such esoteric matters as the rules of the game, internal control procedures and other gaming-related functions. Other professionals, such as attorneys, accountants and IT specialists, already possess the rudiments of their professions, and could be brought up to speed on Commission operations with minimal training conducted by existing staff. The same is true of the licensing specialists and administrative personnel.
- 2. The time and materials required for training of personnel to help out in a dire emergency would depend on the particular position(s) that needed to be filled. For the most part, a typical classroom setting would suffice. For gaming-related tasks, instruction could occur in a licensed gaming school or casino facility.
- 3. A four-year college degree is required for most unclassified positions within the Commission. Consequently, except for those positions that require a professional license or specific technical training, the Commission believes that its entire staff would be amenable to field training.